

April 4, 2010

Daniel H. Morris
Natural Resource Specialist - General Recreation
Humboldt - Toiyabe National Forest
Carson City, NV

RE: CA Off-Highway Motor Vehicle Recreation Division Grants & Cooperative
Agreements Program: Support for Humboldt-Toiyabe National Forest Ground
Operations & Law Enforcement Grants

Dear Daniel,

The Wilderness Society is writing in support of two grants proposed by the Humboldt-Toiyabe National Forest for ground operations and law enforcement. This funding is urgently needed in order to enable the Forest Service to implement its management plan for the Congressionally-designated Bridgeport Winter Recreation Area (BWRA) and to effectively manage this specially designated winter motorized recreation area.

The BWRA was designated by Congress with passage of the Omnibus Public Land Management Act of 2009. The BWRA was a key component of wilderness legislation for the Eastern Sierra sponsored by Senator Barbara Boxer and Rep. Buck McKeon that was included in the omnibus bill. The Wilderness Society worked closely with the legislation's Congressional champions to assure the bill's passage.

The Wilderness Society is currently working with the Forest Service and other stakeholders to develop a management plan for the BWRA. Such action was required by Congress. Congress specifically directed that the Forest Service "develop a winter use management plan that provides for--

- (1) adequate signage;
- (2) a public education program on allowable usage areas;
- (3) measures to ensure adequate sanitation;
- (4) a monitoring and enforcement strategy; and
- (5) measures to ensure the protection of the Trail."

Omnibus Public Land Management Act of 2009.

Congress also directed the Forest Service to provide adequate law enforcement, specifically:

- (1) to prohibit degradation of natural resources in the Recreation Area;
- (2) to prevent interference with nonmotorized recreation on the Trail;
- and
- (3) to reduce user conflicts in the Recreation Area.

The Forest Service and stakeholders have worked hard to this point to develop an acceptable management plan that meets the intent of Congress. What is critically needed is funding to implement the plan.

It is especially important that the BWRA be adequately funded in its first several years of operation. It is the intent of all involved that this area be a model for sustainable winter multiple-use recreation, with an emphasis on motorized (snowmobile) use, but open to non-motorized users as well. We ask that both grants be revised to reflect a higher priority toward funding the BWRA.

We have the following specific comments on the two grants.

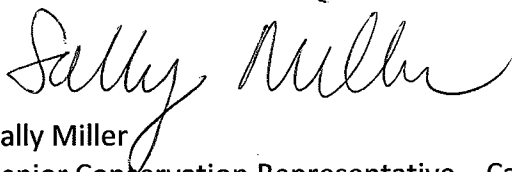
1. The ground operations grant should provide for: signage of closed/open areas, interpretive kiosk with maps and regulations at trailhead (including safety rules for motorized/non-motorized users as well as Marine Corps training information), map development, signs to mark the Pacific Crest Trail and other deliverables that will help ensure the area can be safely and legally used and enjoyed by both motorized and non-motorized users. While we recognize that the emphasis of this area is on motorized use, motorized users need to be aware that non-motorized users may also be using the area.
2. The law enforcement grant needs to be revised to reflect current events. The grant appears to be recycled from a previous year. The grant does not mention the creation of the BWRA. The grant does not prioritize law enforcement activities in the BWRA. We believe that the bulk of the law enforcement grant monies should go toward BWRA enforcement. Since this is a new area, it will take time for riders unfamiliar with the area to get to know it, and the area is bounded on three sides by designated Wilderness. A good, solid law enforcement presence will help riders safely and legally enjoy this area, and make sure that natural resources including the adjacent Hoover and Emigrant Wilderness Areas and the Pacific Crest National Scenic Trail are protected from harm. We also support the use of periodic overflights, combined with the Inyo National Forest, to help monitor use patterns and document problem areas in the vicinity of the BWRA.
3. Be it through ground operations, law enforcement or both grants, we strongly support an on-the-ground presence of Forest Service rangers in the BWRA during the winter-spring use period. The work of these staff should be focused on

education and monitoring of use, and documenting/mitigating any resource problems that may arise.

4. We support the use of the requested summer operations and law enforcement funds to help preserve the primitive nature of the BWRA in the non-winter months. It was the intent of the group that negotiated the initial compromise between snowmobile and wilderness enthusiasts which led to creation to the BWRA and of which The Wilderness Society was a part, that the BWRA should remain in its semi-primitive state. The Leavitt Bowl is a fragile, high-elevation environment with cherry-stemmed road access to Leavitt Lake, a popular camping and fishing destination. Leavitt Lake is also a trailhead portal to the newly designated Hoover Wilderness Additions, the Emigrant Wilderness and the Pacific Crest Trail. Unfortunately, due to the nature of the soils and terrain of the Leavitt Bowl, it is easy for motorized users to forge new trails into the sensitive backcountry. Monies should go toward ensuring that the sensitive natural resources of the Leavitt Bowl as preserved and Leavitt Bowl retains its largely non-motorized character, while still allowing motorized access for fishing, camping and other recreational pastimes.

The Wilderness Society hopes that the BWRA can become *the* model for sustainable winter motorized recreation use throughout the western states. In order for that to occur, adequate funding and support needs to be provided to the Forest Service and its partners to effectively manage and care for this specially-designated area, especially in the initial years of implementation of the BWRA. Thank you for the opportunity to comment on and support these critical grants.

Sincerely,



Sally Miller
Senior Conservation Representative – California

CC: California Off-Highway Motor Vehicle Recreation Division
Grace Newell, Acting District Ranger, Bridgeport Ranger District
Mono County Board of Supervisors
Rep. Buck McKeon
Senator Barbara Boxer